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October 31, 2022

BY ECF

Hon. Katharine S. Hayden, U.S.D.J.  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Hon. Cathy L. Waldor, U.S.M.J.  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Interfor, Inc. v. NXIVM Corp.*,  
Civil Action No. 06-cv-1051 (KSH/CLW)

Dear Judges Hayden and Waldor:

This firm represents crossclaim plaintiff Interfor, Inc. (“Interfor”) in the above-referenced matter. On October 11, 2022, Interfor moved for entry of an Order for the Turnover of Funds (the “Turnover Motion”) in partial satisfaction of an approximately \$2.8 million amended judgment entered by the Court on March 9, 2020 in favor of Interfor against crossclaim defendant NXIVM Corporation (“NXIVM”). Interfor’s application was filed publicly, via ECF. (ECF Nos. 897 and 897-1 through 897-9.)

We write for the limited purpose of informing the Court that any opposition to the Turnover Motion was due on October 24, and to our knowledge, no party to this case nor any other potentially interested party filed an opposition. Insomuch as the Turnover Motion is uncontested, we respectfully request that the Court enter the Proposed Order provided at ECF No. 897-1 at the Court’s earliest convenience.

We thank the Court for your consideration of this matter.

Respectfully submitted,

A blue ink signature of Andrew M. Englander, written in a cursive style.

Andrew M. Englander

cc: All counsel of record (via ECF).